

23 Woodholm Road
Manchester, MA 01944

July 26, 2022

Dear Chair and Board Members of the Manchester, Massachusetts Zoning Board of Appeals:

As a resident of Manchester for over twenty-five years and a trustee of the Manchester Essex Conservation Trust, I am writing to strongly urge the Zoning Board of Appeals (ZBA) to recognize the extreme inappropriateness of SLV's proposed development of Shingle Place Hill and to deny the application that is now before you.

The State has issued a handbook for local ZBAs and other responsible groups to use when conducting design reviews of 40B proposals. This handbook provides very useful guidance when a ZBA is considering whether a proposal should be authorized. One of the guidelines emphasizes that the state's regulations for implementing the chapter 40B law require that a proposed 40B site be "generally appropriate for residential development." The Shingle Place Hill developers chose to ignore this requirement. Rather than finding a site that would be appropriate for residential use, they instead propose to locate this development in an area where absolutely no residential development exists - neither at the site itself nor in the surrounding area. The area is currently zoned as a Limited Commercial District, and while a commercial development of this size and scope would not integrate into the site either, the area has already been established by the town as ill-suited for residential development. For this reason, the proposal should be rejected.

The handbook also directs that the project design be "generally appropriate for the site." To be generally appropriate for the site, consideration must be given to the building massing, the typology, and integration into existing development patterns. The developers fail to meet all three of these considerations. Indeed, the proposed project is massive - greater than the size of Gillette Stadium. It is located at the pinnacle of a hill that is surrounded by woodlands, vernal pools, and wetlands, and the building itself is not at all suitable for the ledge that would have to be blasted to accommodate construction. It does not in any way integrate into an existing development pattern since there is no existing development pattern in the area into which it can integrate. Much of the "neighborhood" is permanently protected conservation land totaling over 3,000 acres.

It disturbs me that, because this project is a 40B, the developer is within their right to ask for exemptions to our town's bylaws. The bylaws were written for a reason, and they cannot safeguard our town if a project of this size is granted permission to ignore them. For all these reasons, the ZBA should deny the application for a comprehensive permit and deny any waivers of the Manchester bylaws.

Sincerely,



George Davis